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August 20, 2024

VIA ECF

Hon. Dale E. Ho
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *King Spider LLC v. Guangzhou Maiyuan Electronic Commerce Co., Ltd., et al.*
Case No. 23-cv-4424 (DEH)
Letter Requesting an Extension of Time to File Opposition to GMEC Co.'s Motion

Dear Judge Ho,

We represent Plaintiff King Spider LLC (“Plaintiff”) in the above-referenced action (“Action”). On August 12, 2024, Defendant Guangzhou Maiyuan Electronic Commerce Co., Ltd. (“GMEC Co.”) filed a motion to dissolve or otherwise modify the PI Order (“GMEC Co.’s Motion”) (Dkt. 69). Thereafter, on August 13, 2024, the Court entered an Order which, *inter alia*, directed Plaintiff to file any opposition to GMEC Co.’s Motion by August 26, 2024. (Dkt. 74). For the reasons set forth herein, Plaintiff respectfully requests a short two-week extension of time to file its opposition. In accordance with Your Honor’s Individual Rules and Practices in Civil Cases, Plaintiff respectfully submits the following:

1. **Original Due Date and New Date Requested:** The original due date for Plaintiff’s opposition to GMEC Co.’s Motion is August 26, 2024 and Plaintiff respectfully requests to file its opposition by September 9, 2024.
2. **Number of Previous Requests for Extension:** None, this is Plaintiff’s first request for an extension of time to file its opposition.
3. **Whether Previous Requests were Granted or Denied:** N/A
4. **The Reason for the Extension:** Plaintiff respectfully requests a short extension of time to file its opposition to GMEC Co.’s Motion as one of the partners handling this case is out of the country this week, and Plaintiff’s counsel has several hearings and Court ordered deadlines this week and next week which have limited Plaintiff’s counsel’s time to adequately review and respond to GMEC Co.’s Motion.
5. **Whether Adversary Consents and Reason for Refusal:** Counsel for GMEC Co. does not consent to Plaintiff’s instant request and did not provide any reason whatsoever for refusing to consent.
6. **Dates of Parties’ Next Scheduled Appearance Before the Court:** The next scheduled appearance before the Court is November 27, 2024 at 2:30 p.m. (Dkt. 63).

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We thank the Court for its time and attention to this matter.

Respectfully submitted,

EPSTEIN DRANGEL LLP

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Application **GRANTED**. Plaintiff shall file its opposition by **September 9, 2024**.
Defendant GMEC Co. shall file its reply by **September 16, 2024**. So Ordered.



Dale E. Ho
United States District Judge
Dated: August 21, 2024
New York, New York